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**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK**

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AEROTEL, LTD., AEROTEL U.S.A., INC. and	:	FILED ELECTRONICALLY
AEROTEL U.S.A., LLC,	:	
	:	Civil Action No. 07-Civ-3217 (RJH)
Plaintiffs,	:	
	:	<b>NOTICE OF MOTION (1) OF</b>
-v-	:	<b>DEFENDANTS AT&amp;T INC. AND</b>
	:	<b>BELLSOUTH CORPORATION</b>
AT&T INC., AT&T CORP., AT&T MOBILITY	:	<b>TO DISMISS THE COMPLAINT</b>
CORPORATION, AT&T MOBILITY LLC, NEW	:	<b>FOR LACK OF PERSONAL</b>
CINGULAR WIRELESS SERVICES, INC.	:	<b>JURISDICTION; (2) OF ALL</b>
(formerly AT&T Wireless Services, Inc.),	:	<b>DEFENDANTS TO DISMISS THE</b>
CINGULAR WIRELESS II, LLC (formerly Cingular	:	<b>COMPLAINT FOR FAILURE</b>
Wireless II, Inc.), NEW CINGULAR WIRELESS	:	<b>TO STATE A CLAIM</b>
PCS, LLC, BELLSOUTH MOBILITY DCS, INC.,	:	<b>OR, IN THE ALTERNATIVE,</b>
BELLSOUTH CORPORATION, BELLSOUTH	:	<b>FOR A MORE DEFINITIVE</b>
TELECOMMUNICATIONS, INC., and JOHN	:	<b>STATEMENT; AND (3) OF ALL</b>
DOES 1-10,	:	<b>DEFENDANTS TO DISMISS</b>
	:	<b>THE CLAIMS OF AEROTEL</b>
Defendants.	:	<b>U.S.A., INC. AND AEROTEL</b>
	:	<b>U.S.A., LLC FOR LACK OF</b>
	:	<b><u>STANDING</u></b>
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PLEASE TAKE NOTICE that upon the annexed declarations of Terrence Britt, dated August 6, 2007; James W. Lacy, Jr., dated August 7, 2007; and Joseph P. Zammit, dated August 10, 2007, and the exhibits thereto, and upon the accompanying Memorandum of Law and all pleadings and proceedings heretofore had, Defendants, by their undersigned counsel, will move this Court before the Honorable Richard J. Holwell, U.S.D.J., in Courtroom 17B of the United

States Courthouse, 500 Pearl Street, New York, NY, at a date and time to be designated by the Court, for an order: (1) dismissing the Complaint as against AT&T Inc. and BellSouth Corporation, pursuant to Fed. R. Civ. P. 12(b)(2), on the ground that there is no personal jurisdiction over them since they are not present in, and do not conduct business in, New York; (2) dismissing the Complaint as against all Defendants pursuant to Fed. R. Civ. P. 12(b)(6) or, in the alternative, granting a more definite statement pursuant to Fed. R. Civ. P. 12(e), on the ground that the Complaint does not identify any products or services alleged to infringe Plaintiffs' patent or identify what each Defendant is supposed to have done; (3) dismissing the claims of Aerotel U.S.A., Inc. and Aerotel U.S.A., LLC, pursuant to Fed. R. Civ. P. 12(b)(6), for lack of standing; and (4) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the July 18, 2007, Order of the Court, opposition papers, if any, are to be filed on September 10, 2007, and reply papers, if any, are to be filed on September 19, 2007.

Dated: New York, New York  
August 10, 2007

FULBRIGHT & JAWORSKI L.L.P.

By: /s/ Joseph P. Zammit  
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